

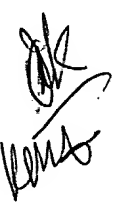
Summary of the Amendment

Upon entry of the above amendment, claims 1, 3, 9, 12, 20, 23, 27, and 37 will have been amended and claims 10 and 11 will have been canceled without prejudice or disclaimer. Accordingly, claims 1 - 9 and 12 - 41 currently remain pending.

Summary of the Official Action

In the instant Office Action, the Examiner has rejected to the claims based upon formal matters and over the art of record. By the present amendment and remarks, Applicant submits that the rejections have been overcome, and respectfully requests reconsideration of the outstanding Office Action and allowance of the present application.

Acknowledgment of Interview with Examiner Hastings

 Applicants gratefully acknowledge the courtesy extended to their representative by Examiner Hastings in conducting a personal interview on September 4, 2002. In the interview, the instant amendment to the claims was discussed, as well as how the invention is distinguishable over the art of record.

Traversal of Rejection Under 35 U.S.C. § 112, Second Paragraph

Applicant traverses the rejection of claims 1 - 41 under 35 U.S.C. § 112, second paragraph, as being indefinite. By the present amendment, Applicant has amended claims 1 and 23 to more positively recite a driving device, as requested by the Examiner, and has amended claims 8 and 27 to provide adequate antecedent basis for the recited terms, as suggested by the Examiner.

Further, claim 20 has been amended to address and overcome the Examiner's noted instance of indefiniteness by reciting "further comprising felts"

Accordingly, Applicant submits that, as each noted instance of indefiniteness has been addressed and overcome by the instant amendments, the rejection is now moot. Therefore, Applicant requests that the Examiner reconsider and withdraw the rejection of claims 1 - 41 under 35 U.S.C. § 112, second paragraph, and indicate that these claims are fully in compliance with the requirements of the statute.

Traversal of Rejection Under 35 U.S.C. § 102(b)/35 U.S.C. § 103(a)

Applicant traverses the rejection of claims 1 - 3, 5, 8, 10, 18 - 21, 23 - 25, and 37 under 35 U.S.C. § 102(b) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as being unpatentable over German Patent Application No. 298 11 048 [hereinafter "DE '048"] or SCHIEL et al. (U.S. Patent No. 6,065,396) [hereinafter "SCHIEL"]. The Examiner notes Figure 5 of DE '048 and column 1, lines 63 - 66 and column 2, lines 63 - 67 of SCHIEL. Applicants traverse the Examiner's assertions.

By the present amendment, Applicant has amended independent claims 1, 23, and 37 to recite, *inter alia*, at least one of said at least two press belts comprises a water permeable wire web, and at least one of said at least two sealing belts comprises an open press surface that is at least one of blind bored and grooved (in terms of independent claim 1). Moreover, Applicant submits that neither DE '048 nor SCHIEL anticipate or render unpatentable at least

the above-noted features.

1. DE '048

With regard to DE '048, and, in particular, Figure 5 of DE '048, Applicant notes that this document is directed to a pressing arrangement in which an apparent flat nip is formed between shoe press rolls 20 and 22. A press jacket 40 is guided around the upper press shoe of shoe press roll 20, and, while not specifically identified in the document, a press jacket is likely guided around the lower press shoe of shoe press roll 22.

While not specifically identified in Figure 5 of DE '048, the other Figures indicate that a pair of *press felts* (upper press felt 14 and lower press felt 18) are guided through the nip. Thus, Applicant submits that Figure 5 of DE '048 is analogous (albeit a flat nip) to the double felted press discussed in the Background of the Invention section of the instant application and illustrated in prior art Figure 1.

Thus, Applicant submits that, as the press felts of DE '048 are not press belts, as recited in at least the independent claims, and certainly not a water permeable wire web, as is also recited in each of the independent claims, DE '048 fails to anticipate the instant invention.

Therefore, as DE '048 fails to show at least the above-noted expressly recited features of at least independent claims 1, 23, and 37, Applicant submits that DE '048 fails to provide an adequate evidentiary basis to support a rejection of anticipation under 35 U.S.C. § 102(b)

and that the instant rejection is improper and should be withdrawn.

Still further, Applicant submits that, while DE '048 discloses two shoe press rolls with roll jackets arranged to form a nip through which press felts sandwiching the web are guided, there is no teaching or suggestion of additionally providing driven press belts on each side of the web, as is recited in at least independent claims 1, 23, and 37. Further still, Applicant submits that there certainly no arguable basis to assert that it would have been obvious to modify DE '048 to additionally include at least one of the driven press belt on each side of the web, in which at least one of the press belts is a water permeable wire web, as recited in at least independent claims 1, 23, and 37.

Because the applied art fails to provide any motivation or rationale for modifying DE '048 to include the additional driven press belts, and particularly to include the specific press belt recited in the instant claims, Applicant submits that the applied art fails to render unpatentable the combination of features recited in at least the independent claims.

Further, Applicant submits that claims 2, 3, 5, 8, 18 - 21, and 23 - 25 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper modification of DE '048 teaches or suggests, *inter alia*, said fibrous material web comprises one of a paper and a cardboard web, as recited in claim 2; each of said at least two press belts are dewatering belts, as recited in claim 3; at least one

of said two shoe press units comprises a shoe press roll and said sealing belt comprises a jacket of said shoe press roll, as recited in claim 5; at least one of said at least two press belts comprises an open press surface, as recited in claim 8; press surfaces of said at least two press belts have a same hardness, as recited in claim 18; at least one of said at least two sealing belts comprises a continuous, smooth surface, as recited in claim 19; felts with few markings arranged to be guided through said press nip, and said felts being arranged to cause symmetrical dewatering, as recited in claim 20; outside of said press nip, said at least two press belts are guided separately from said at least two sealing belts, as recited in claim 21; the fibrous material web comprises at least one of a paper and a cardboard web, as recited in claim 24; said shoe press is the only press, as recited in claim 25.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection claims 1 - 3, 5, 8, 18 - 21, 23 - 25, and 27 under 35 U.S.C. § 102(b)/35 U.S.C. § 103(a) over DE '048 and indicate that these claims are allowable.

2. Over Schiel

Applicant notes that, while SCHIEL discloses a flat nip press device having a web guide belt 6 arranged as a drive belt for the press, there is no teaching or suggestion that this guide belt comprises a water permeable wire web, as recited in at least independent claims 1, 23, and 37.

Because SCHIEL fails to disclose that guide belt 6 is a water permeable wire web,

Applicant submits that this document cannot anticipate the instant invention. Accordingly, Applicant submits that SCHIEL fails to provide an adequate evidentiary basis to support a rejection of anticipation under 35 U.S.C. § 102(b).

Moreover, given the stresses to be exerted on and by the guide belt of SCHIEL, it is not apparent from the art of record that one ordinarily skilled in the art would be motivated to utilize such a water permeable wire web for such a use.

Still further, while the Examiner asserts that SCHIEL suggests using a guide belt for each press, Applicant submits that this would appear to create additional considerations, such as problems with regard to speed regulation and control between the guide belts, particularly, since it is unclear how the driving device would be affected by the use of a water permeable wire web as a guide belt.

Accordingly, Applicant submits that SCHIEL fails to teach or suggest the combination of features recited in at least the independent claims, and certainly fails to provide the requisite motivation or rationale for modifying the art of record in any manner that would render the instant invention obvious. Thus, Applicant submits that the instant rejection is improper and should be withdrawn.

Further, Applicant submits that claims 2, 3, 5, 8, 18 - 21, and 23 - 25 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular,

Applicant submits that no proper modification of SCHIEL teaches or suggests, *inter alia*, said fibrous material web comprises one of a paper and a cardboard web, as recited in claim 2; each of said at least two press belts are dewatering belts, as recited in claim 3; at least one of said two shoe press units comprises a shoe press roll and said sealing belt comprises a jacket of said shoe press roll, as recited in claim 5; at least one of said at least two press belts comprises an open press surface, as recited in claim 8; press surfaces of said at least two press belts have a same hardness, as recited in claim 18; at least one of said at least two sealing belts comprises a continuous, smooth surface, as recited in claim 19; felts with few markings arranged to be guided through said press nip, and said felts being arranged to cause symmetrical dewatering, as recited in claim 20; outside of said press nip, said at least two press belts are guided separately from said at least two sealing belts, as recited in claim 21; the fibrous material web comprises at least one of a paper and a cardboard web, as recited in claim 24; said shoe press is the only press, as recited in claim 25.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection claims 1 - 3, 5, 8, 18 - 21, 23 - 25, and 27 under 35 U.S.C. § 102(b)/35 U.S.C. § 103(a) over SCHIEL and indicate that these claims are allowable.

Traversal of Rejection Under 35 U.S.C. § 103(a)

1. DE '048 and/or Schiel as necessary with MacDonald

Applicant traverses the rejection of claims 1 - 41 under 35 U.S.C. § 103(a) as being

unpatentable over DE '048 and/or SCHIEL and further as necessary with MacDONALD et al. (*Pulp and Paper Manufacture*, 2nd ed., Vol. III ("Papermaking and Paperboard Making")) [hereinafter "MacDONALD"].

While the Examiner asserts that MacDONALD teaches that all rolls and cylinders will one day be driven, Applicant submits that the Examiner has overstated MacDONALD's disclosure. Applicant notes that the applied portion of the document is related to helper motors, and it is disclosed that, helper motors will likely become more prevalent in the art to assist the driving of rolls and cylinders which are currently driven only by belts. In this regard, MacDONALD provides a chart of various rolls and cylinders for which helper motors will likely be utilized. However, MacDONALD has not stated that one day a drive will be on *every* roll or cylinder in a papermaking machine.

Moreover, Applicant notes that, notwithstanding the discussion of helper motors, MacDONALD fails to teach or suggest the subject matter noted above as deficient in either of DE '048 and SCHIEL. In particular, MacDONALD fails to teach or suggest a press belt comprising a water permeable wire web.

As none of the applied documents teach or suggest at least the above-noted feature, Applicant submits that no proper combination of the applied documents renders unpatentable the combination of features recited in at least independent claims 1, 23, and 37.

Further, Applicant submits that MacDONALD fails to provide any motivation or

suggestion for additionally including drive belts on each side of the web in a double felted press, such as taught by DE '048, and certainly fails to teach or suggest that at least one of the drive belts is a water permeable wire web, as recited in the independent claims.

Applicant further submits that MacDONALD fails to provide any motivation or suggestion for modifying the web guide belt of SCHIEL to a water permeable wire web, as recited in the independent claims.

Because the applied art fails to provide any motivation or rationale for modifying with DE '048 or SCHIEL in any manner which would render the instant invention obvious, Applicant submits that the instant rejection is improper and should be withdrawn.

Further, Applicant submits that claims 2 - 9 and 12 - 22, 24 - 26, and 28 - 41 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of DE '048 and/or SCHIEL as necessary with MacDONALD teaches or suggests, *inter alia*, said fibrous material web comprises one of a paper and a cardboard web, as recited in claim 2; each of said at least two press belts are dewatering belts, as recited in claim 3; at least two felts arranged on opposite sides of the fibrous material web, whereby said press nip comprises a double-felted press nip, said at least two felts are arranged between said press belts, such that said at least two felts are guided substantially horizontally through said press nip together with the fibrous material

web, as recited in claim 4; at least one of said two shoe press units comprises a shoe press roll and said sealing belt comprises a jacket of said shoe press roll, as recited in claim 5; a press plane through said press nip is inclined in relation to a vertical reference, as recited in claim 6; said press plane is inclined in relation to the vertical reference by an angle (α) in the region of approximately 10° to approximately 45° , as recited in claim 7; at least one of said at least two press belts comprises an open press surface, as recited in claim 8; a press surface of said at least one press belt is at least one of blind bored and grooved, as recited in claim 9; said at least one water permeable wire web press belt and said at least one open press surface sealing belt are arranged in a same press shoe unit, as recited in claim 12; at least one deflection roll and a collector positioned in a region of said at least one deflection roll, subsequent to said press nip, at least one of said at least two press belts is guided around said at least one deflection roll, whereby water thrown off said press belt as it is guided around said at least one deflection roll is collected in said collector, as recited in claim 13; a scraper allocated to said at least one deflection roll, as recited in claim 14; said at least one deflection roll is driven, as recited in claim 15; at least one additional driven deflection roll around which said at least one press belt is guided, as recited in claim 16; said at least one deflection roll is structured and arranged as a belt travel control roll, as recited in claim 17; press surfaces of said at least two press belts have a same hardness, as recited in claim 18; at least one of said at least two sealing belts comprises a continuous, smooth surface, as recited in

claim 19; felts with few markings arranged to be guided through said press nip, and said felts being arranged to cause symmetrical dewatering, as recited in claim 20; outside of said press nip, said at least two press belts are guided separately from said at least two sealing belts, as recited in claim 21; prior to said press nip, at least one of said at least two press belts is guided around a deflection roll structured and arranged as a belt travel control roll, as recited in claim 22; the fibrous material web comprises at least one of a paper and a cardboard web, as recited in claim 24; said shoe press is the only press, as recited in claim 25; at least two felts arranged on opposite sides of the fibrous material web, whereby said press nip comprises a double-felted press nip, said at least two felts are arranged between said press belts, such that said at least two felts are guided substantially horizontally through said press nip together with the fibrous material web, as recited in claim 26; the fibrous material web is accepted by one of said at least two felts from a wire belt, as recited in claim 27; a suctioned guidance roll located in a region of a transfer position, at least one of said at least two felts is guided around said suctioned guidance roll, as recited in claim 28; the fibrous material web is accepted from the wire belt by an upper felt, as recited in claim 29; said at least two felts are brought together before said press nip and are subsequently guided to said press nip while sandwiching the fibrous material web, as recited in claim 30; a suctioned guidance roll arranged downstream, relative to a web run direction, from said press nip, the fibrous material web is guided out of said press nip together with said at least two felts and

is subsequently guided together with one of said at least two felts around said suctioned guidance roll, which is located in a region in which the fibrous material web is accepted by another section of the machine, as recited in claim 31; a drying wire is guided in the region of said suctioned guidance roll to accept the fibrous material web from said one felt, as recited in claim 32; the one felt comprises a lower felt, such that the fibrous material web is accepted from said lower felt by the drying wire, as recited in claim 33; another guidance roll arranged to guide said one felt, the fibrous material web is accepted by the drying wire in a region between said suctioned guidance roll and said another guidance roll, as recited in claim 34; the drying wire is guided around a suctioned guidance roll in the region of acceptance, as recited in claim 35; said at least two press belts are arranged to be separated immediately after said press nip from said at least two felts which sandwich the fibrous material web, as recited in claim 36; first and second felts arranged to sandwich the fibrous material web, as recited in claim 38; said first and second felts are arranged between said first and second press belts, as recited in claim 39; a pressing plane of said press nip is obliquely oriented in relation to a vertical reference, as recited in claim 40; said pressing plane is obliquely oriented at an angle of between about 10° and about 45° from the vertical reference, as recited in claim 41.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection claims 1 - 9 and 12 - 41 under 35 U.S.C. § 103(a) and indicate that these claims are

allowable.

2. Over DE '048 and/or Schiel as necessary with MacDonald and further in view of Dahl, EP '790, and if needed Steiner

Applicant traverses the rejection of claims 4 and 26 - 36 under 35 U.S.C. § 103(a) as being unpatentable over DE '048 and/or SCHIEL as necessary with MacDONALD and further in view of DAHL (U.S. Patent No. 4,915,790) if needed with European Patent Application No. 0 064 933 [hereinafter "EP '790"] and if needed with STEINER et al. (U.S. Patent No. 6,325,894) [hereinafter "STEINER"]. The Examiner asserts that DAHL shows multiple fabrics passing through the nip and that EP '790 shows a drive belt and multiple felts passing through the nip, and that it would have been obvious to modify DE '048 and/or SCHIEL with MacDONALD to include such multiple felts.

Applicant initially notes that STEINER cannot be applied against the pending claims under 35 U.S.C. § 103(a). In particular, under 35 U.S.C. § 103(c), subject matter developed by another person, which qualifies as prior art only under one of 35 U.S.C. 102(e), (f), or (g) shall not preclude patentability under 35 U.S.C. § 103 where the subject matter and the claimed invention (filed in the U.S. Patent and Trademark Office after November 29, 1999) were, at the time the invention was made, commonly owned. In other words, if, at the time the instant invention was made, the instant invention and STEINER were commonly owned, STEINER cannot be used as a reference against the claimed invention under 35 U.S.C. § 103.

As the instant application was filed October 19, 2001, i.e., after the effective date of the 35 U.S.C. § 103(c), STEINER cannot be applied against the pending claims under 35 U.S.C. § 103(a) if it and the instant invention were commonly owned at the time the instant application was filed in the U.S. Patent and Trademark Office.

Applicants note that, while Voith Sulzer Papiertechnik Patent GmbH is the assignee of record in STEINER, all assets, including intellectual property rights, of Voith Sulzer Papiertechnik Patent GmbH were transferred to Voith Paper Patent GmbH on September 13, 2000, as evidenced by the concurrently submitted verified English language translation of the enclosed pages of the Commercial Register of Heidenheim, Germany.

Accordingly, Applicant submits that, as the instant invention and STEINER were commonly owned at the time of the instant invention, STEINER cannot be used as a reference against the pending claims under 35 U.S.C. § 103(a).

Further, while DAHL purportedly teaches the use of multiple fabrics in the press nip and EP '933 purportedly teaches a drive belt and a felt passing to through a nip, Applicant submits neither document teaches or suggests the subject matter noted above as deficient in either of DE '048 and SCHIEL (with or without MacDONALD). In particular, neither document teaches or suggests a press belt comprising a water permeable wire web, as recited in at least the independent claims.

As none of the applied documents teach or suggest at least the above-noted feature,

Applicant submits that no proper combination of the applied documents renders unpatentable the combination of features recited in at least independent claims 1, 23, and 37.

Further, Applicant submits that neither DAHL nor EP '933 provides the requisite motivation or rationale for additionally including drive belts on each side of the web in a double felted press, such as taught by DE '048, and certainly fails to teach or suggest that at least one of the drive belts is a water permeable wire web, as recited in the independent claims.

Moreover, Applicant submits that DAHL and EP '933 fails to provide the necessary motivation or rationale for modifying the web guide belt of SCHIEL to be a water permeable wire web, as recited in the independent claims.

Because the applied art fails to provide any motivation or rationale for modifying DE '048 or SCHIEL in any manner which would render the instant invention obvious, Applicant submits that the instant rejection is improper and should be withdrawn.

Further, Applicant submits that claims 4 and 26 - 36 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of DE '048 and/or SCHIEL as necessary with MacDONALD and further in view of DAHL, EP '790, and if needed STEINER, teaches or suggests, *inter alia*, at least two felts arranged on opposite sides of the fibrous material web, whereby said press

nip comprises a double-felted press nip, said at least two felts are arranged between said press belts, such that said at least two felts are guided substantially horizontally through said press nip together with the fibrous material web, as recited in claim 4; at least two felts arranged on opposite sides of the fibrous material web, whereby said press nip comprises a double-felted press nip, said at least two felts are arranged between said press belts, such that said at least two felts are guided substantially horizontally through said press nip together with the fibrous material web, as recited in claim 26; the fibrous material web is accepted by one of said at least two felts from a wire belt, as recited in claim 27; a suctioned guidance roll located in a region of a transfer position, at least one of said at least two felts is guided around said suctioned guidance roll, as recited in claim 28; the fibrous material web is accepted from the wire belt by an upper felt, as recited in claim 29; said at least two felts are brought together before said press nip and are subsequently guided to said press nip while sandwiching the fibrous material web, as recited in claim 30; a suctioned guidance roll arranged downstream, relative to a web run direction, from said press nip, the fibrous material web is guided out of said press nip together with said at least two felts and is subsequently guided together with one of said at least two felts around said suctioned guidance roll, which is located in a region in which the fibrous material web is accepted by another section of the machine, as recited in claim 31; a drying wire is guided in the region of said suctioned guidance roll to accept the fibrous material web from said one felt, as

recited in claim 32; the one felt comprises a lower felt, such that the fibrous material web is accepted from said lower felt by the drying wire, as recited in claim 33; another guidance roll arranged to guide said one felt, the fibrous material web is accepted by the drying wire in a region between said suctioned guidance roll and said another guidance roll, as recited in claim 34; the drying wire is guided around a suctioned guidance roll in the region of acceptance, as recited in claim 35; and said at least two press belts are arranged to be separated immediately after said press nip from said at least two felts which sandwich the fibrous material web, as recited in claim 36.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection claims 4 and 26 - 36 under 35 U.S.C. § 103(a) and indicate that these claims are allowable.

3 DE '048 and/or Schiel as necessary with MacDonald and further in view of Laapotti

Applicant traverses the rejection of claims 13 - 17, 22, 40, and 41 under 35 U.S.C. § 103(a) as being unpatentable over DE '048 and/or SCHIEL as necessary with MacDONALD and further in view of LAAPOTTI (U.S. Patent No. 5,662,778). The Examiner asserts that LAAPOTTI shows a press plane inclined, and that it would have been obvious to modify DE '048 and/or SCHIEL with MacDONALD to include such an orientation.

While LAAPOTTI purportedly teaches the use of inclined press planes, Applicant submits LAAPOTTI neither teaches nor suggests the subject matter noted above as deficient

in either of DE '048 and SCHIEL (with or without MacDONALD). In particular, LAAPOTTI fails to teach or suggest a press belt comprising a water permeable wire web, as recited in at least the independent claims.

As none of the applied documents teach or suggest at least the above-noted feature, Applicant submits that no proper combination of the applied documents renders unpatentable the combination of features recited in at least independent claims 1, 23, and 37.

Further, Applicant submits that LAAPOTTI also fails to provide the requisite motivation or rationale for additionally including drive belts on each side of the web in a double felted press, such as taught by DE '048, and certainly fails to teach or suggest that at least one of the drive belts is a water permeable wire web, as recited in the independent claims.

Moreover, Applicant submits that LAAPOTTI fails to provide the necessary motivation or rationale for modifying the web guide belt of SCHIEL to be a water permeable wire web, as recited in the independent claims.

Because the applied art fails to provide any motivation or rationale for modifying DE '048 or SCHIEL in any manner which would render the instant invention obvious, Applicant submits that the instant rejection is improper and should be withdrawn.

Further, Applicant submits that claims 13 - 17, 22, 40, and 41 are allowable at least for the reason that these claims depend from allowable base claims and because these claims

recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of DE '048 and/or SCHIEL as necessary with MacDONALD and further in view of LAAPOTTI teaches or suggests, *inter alia*, at least one deflection roll and a collector positioned in a region of said at least one deflection roll, subsequent to said press nip, at least one of said at least two press belts is guided around said at least one deflection roll, whereby water thrown off said press belt as it is guided around said at least one deflection roll is collected in said collector, as recited in claim 13; a scraper allocated to said at least one deflection roll, as recited in claim 14; said at least one deflection roll is driven, as recited in claim 15; at least one additional driven deflection roll around which said at least one press belt is guided, as recited in claim 16; said at least one deflection roll is structured and arranged as a belt travel control roll, as recited in claim 17; prior to said press nip, at least one of said at least two press belts is guided around a deflection roll structured and arranged as a belt travel control roll, as recited in claim 22; a pressing plane of said press nip is obliquely oriented in relation to a vertical reference, as recited in claim 40; said pressing plane is obliquely oriented at an angle of between about 10° and about 45° from the vertical reference, as recited in claim 41.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection claims 13 - 17, 22, 40, and 41 under 35 U.S.C. § 103(a) and indicate that these claims are allowable.

Application is Allowable

Thus, Applicants respectfully submit that each and every pending claim of the present invention meets the requirements for patentability under 35 U.S.C. §§ 102 and 103, and respectfully request the Examiner to indicate allowance of each and every pending claim of the present invention.

Authorization to Charge Deposit Account

The Commissioner is authorized to charge to Deposit Account No. 19 - 0089 any necessary fees, including any extensions of time fees required to place the application in condition for allowance by Examiner's Amendment, in order to maintain pendency of this application.

CONCLUSION

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the Applicants' invention, as recited in each of claims 1 - 9 and 12 - 41. The claims have been amended to eliminate any arguable basis for rejection under 35 U.S.C. § 112. In addition, the applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.


Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no

P21299.A04

estoppel should be deemed to attach thereto.

Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and now believed to be appropriate.

Respectfully submitted,
Andreas MESCHENMOSER


Neil F. Greenblum
Reg. No. 28,394 *FA 35.2/3*

September 9, 2002
GREENBLUM & BERNSTEIN, P.L.C.
1941 Roland Clarke Place
Reston, VA 20191
(703) 716-1191

APPENDIX

Marked-Up Copies of the Amended Claims:

1. (Amended) A shoe press for processing a fibrous material web, comprising:
two shoe press units arranged to form an essentially level press nip elongated in a web travel direction;

each of said two shoe press units comprising a circulating flexible, continuous sealing belt and a press shoe, such that said circulating flexible, continuous sealing belt is arranged to be guided over said press shoe in a region of said press nip; [and]

at least one driving device; and

at least two driven continuous press belts each drivably coupled to said at least one driving device and arranged such that at least one of said at least two driven continuous press belts are positioned on each side of the fibrous material web to guide the fibrous material web through said press nip,

wherein at least one of said at least two press belts comprises a water permeable wire web, and at least one of said at least two sealing belts comprises an open press surface that is at least one of blind bored and grooved.

3. (Amended) The shoe press in accordance with claim 1, wherein each of said at least two press belts [comprise a] are dewatering [belt] belts.

9. (Amended) The shoe press in accordance with claim [7] 8, wherein a press surface of said at least one press belt is at least one of blind bored and grooved.

12. (Amended) The shoe press in accordance with claim [11] 1, wherein said at least one water permeable wire web press belt and said at least one open press surface sealing belt are arranged in a same press shoe unit.

20. (Amended) The shoe press in accordance with claim 1, [wherein] further comprising felts with few markings [are] arranged to be guided through said press nip, and said felts [are] being arranged to cause symmetrical dewatering.

23. (Amended) A press section of a machine for producing a fibrous material web, comprising:

a shoe press including two shoe press units arranged to form an essentially level press nip elongated in a web travel direction;

each of said two shoe press units comprising a circulating flexible, continuous sealing belt and a press shoe, such that said circulating flexible, continuous sealing belt is arranged to be guided over said press shoe in a region of said press nip; [and]

at least one driving device;

each of said two shoe press units comprising at least one driven continuous press belt drivably coupled to said at least one driving device, such that at least one driven continuous press belt is positioned on each side of the fibrous material web to guide the fibrous material web through said press nip,

wherein at least one of said at least one press belts comprises a water permeable wire

web, and at least one of said sealing belts comprises an open press surface that is at least one of blind bored and grooved.

27. (Amended) The press section in accordance with claim [23] 26, wherein the fibrous material web is accepted by one of said at least two felts from a wire belt.

37. (Amended) A shoe press for processing a fibrous material web, comprising:
first and second shoe press units arranged to form an essentially level press nip elongated in a web travel direction;

said first shoe press unit comprising a first circulating flexible, continuous sealing belt and a first press shoe, such that said first circulating flexible, continuous sealing belt is arranged to be guided over said first press shoe in a region of said press nip;

said second shoe press unit comprising a second circulating flexible, continuous sealing belt and a second press shoe, such that said second circulating flexible, continuous sealing belt is arranged to be guided over said second press shoe in a region of said press nip,
wherein at least one of said first sealing belt and said second sealing belt comprises an open press surface that is at least one of blind bored and grooved;

first and second continuous press belts arranged such that said first continuous press belt is positioned between said first press shoe and the fibrous material web, and said second continuous press belt is positioned between said second press shoe and the fibrous material web, wherein at least one of said first and second press belts comprises a water permeable

P21299.A04

wire web; and

first and second press belt driving devices arranged to drive said first and said second press belts, respectively.